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INTUIT INC.; THE EMPLOYEE BENEFITS
ADMINISTRATIVE COMMITTEE OF THE INTUIT
INC. 401 (K) PLAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEBORAH RODRIGUEZ,
individually and as a representative of a class of
participants and beneficiaries on behalf of the
intuit Inc. 401 (k) Plan,

Plaintiff,

v.

INTUIT INC.; THE EMPLOYEE BENEFITS
ADMINISTRATIVE COMMITTEE OF THE
INTUIT INC. 401(K) PLAN; and DOES 1 to 10
inclusive,

Defendants.

Case No. 5:23-cv-05053-PCP

**STIPULATION TO SET A BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTION TO DISMISS AND CONTINUE
THE CASE MANAGEMENT
CONFERENCE**

TO THE HONORABLE COURT:

Pursuant to Local Rule 6-1(b), Defendants Intuit Inc. and The Employee Benefits Administrative Committee of the Intuit Inc. 401(k) Plan and Plaintiff Deborah Rodriguez, by and through their counsel of record, stipulate as follows:

WHEREAS, Plaintiff filed her Class Action Complaint on October 2, 2023 (Dkt. 1);

WHEREAS, there is an Initial Case Management Conference before this Court on January 4, 2024 (Dkt. 12);

WHEREAS, Defendants' deadline to respond to Plaintiffs' Complaint is December 4, 2023;

WHEREAS, Defendants anticipate filing a motion to dismiss Plaintiff's Complaint that would, if granted, dismiss Plaintiff's Complaint in full;

WHEREAS, under Local Rule 7-3, Plaintiff's deadline to file an opposition is December 18, 2023, and Defendants' deadline to file their reply is December 26, 2023;

WHEREAS, the Parties have conferred and agree that good cause exists to extend the Parties' briefing deadlines for Defendants' motion given the complexity of the issues, the dispositive nature of Defendants' motion, and anticipated delays caused by holidays;

WHEREAS, no harm or prejudice will result from the proposed changes;

WHEREAS, the Parties further agree that it would promote efficiency and judicial economy to continue the Initial Case Management Conference to 21 days after the hearing on Defendants' motion to dismiss, *see* Hon. P. Casey Pitts, *Standing Ord. for Civil Cases*, § VI, Nov. 13, 2023 (permitting parties to stipulate to extend date for case management conference where defendant intends to file dispositive motion to dismiss);

WHEREAS, the Parties have previously stipulated to an extension to extend the deadline for Defendants' response to Plaintiffs' Complaint (Dkt. 15);

WHEREAS, this Court has made no statements prohibiting future extensions;

THEREFORE, the Parties stipulate and respectfully request that the Court set the following stipulated dates:

STIPULATION TO SET A BRIEFING SCHEDULE FOR DEFENDANTS' MOTION TO
DISMISS AND CONTINUE THE CASE MANAGEMENT CONFERENCE - 5:23-cv-05053-
PCP

Event	Original Date	Stipulated Date
Defendants' Motion to Dismiss	December 4, 2023	December 18, 2023
Plaintiff's Opposition	December 18, 2023	January 22, 2024
Defendants' Reply	December 26, 2023	February 5, 2024
Noticed Hearing	N/A	February 22, 2024
Case Management Conference	January 2, 2024	March 14, 2024 (21 days after the hearing on Defendants' Motion to Dismiss)

Dated: November 29, 2023

GROOM LAW GROUP, CHARTERED
/s/ Sarah M. Adams (pro hac vice)
Attorney for Defendants

HAYES PAWLENKO LLP
/s/ Kye Douglas Pawlenko
Kye Douglas Pawlenko

STIPULATION TO SET A BRIEFING SCHEDULE FOR DEFENDANTS' MOTION TO
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